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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

)	CASE NO. C-1-01-0021
)	
)	
JAN ALBERT CREUSERE,)	
Plaintiff,)	Judge Beckwith
)	
vs.)	
)	
OHIO & VICINITY REGIONAL)	
COUNCIL OF CARPENTERS,)	
)	
Defendant,)	
-----)	

**INITIAL DISCOVERY
ACCORDING TO RULE 26**

The following is discoverable information for Case # C-1-01-0021 supplied by Plaintiff, Jan A. Creusere. The format follows Rule 26 (a) (1) (A), (B), (C), & (D) and (a) (2) (A) and (3) (A), (B), & (C). The Defendant is called the "Carpenter's Union" throughout this document.

26 (a) (1) (A) The following people have discoverable information concerning this case. Note: This is not to be construed as a comprehensive list.

Ron Adkins
Dave Chaney
Bill Metz
Gregory Martin
Dave Nelson
Harvey Adams
Dan McElroy
James Robinson

26 (a) (1) (B) The following documents will be involved with this case. Note: This is a preliminary list and may include other documents as Discovery develops.

EEOC charge against Carpenter's Union dated June 20, 2000,

Correspondence with the EEOC about them not providing me with proper documentation of the dismissal of my charge with the Carpenter's Union and the "Right to Sue" letter,

Letters to Carpenter's Union in regard to Sabbathkeepers' rights and needs in contracts/CBA's,

Letters to Greg Martin, and/or Dave Chaney,

Copies of any Union contracts I called into question,

List of dates of complaints made to the Ohio Bureau of Employment services (now Ohio Job and Family Services) about problems obtaining employment through the Union hall,

Copy of ad placed in Cincinnati Enquirer offering "Immediate Employment" to carpenter's joining the Union dated August, 1998,

Copy of tape recording where I posed as one "Albert Evans" calling the Carpenter's Union (as per newspaper ad) and was offered a job by the end of the week and where I hung up and recalled the Union and talked to Harvey Adams trying to get a job and was told it would be at least three weeks before I could go to work,

Copy of several invitations over several years of the Carpenter's Union inviting me (and all members) to a special Christmas party,

Copy of e-mail correspondence where the Carpenter's Union refused to assist me in my appeal of Case # C-1-98-124 with the 6th District Federal Court and Case # 02-3426 of the 6th Circuit Court of Appeals in the summer of 2002,

Copies of several NLRB charges against the Carpenter's Union, various dates and events,

Copies of correspondence with Jim Robinson, an attorney who represented the Carpenter's Union from 1997 until sometime in 2002,

Copy of letter I sent to Dan McElroy in May 1997 in which I spelled out the needs of and requested negotiations for Sabbath-keepers in regard to the contract negotiations between the Carpenter's Union and The Board of Education of the City School District of the City of Cincinnati,

Flier I handed out in public when I demonstrated against Lane Public Library in Oxford, Ohio on March 5, 2000 when they tried to fire a librarian who refused to work on Sunday,

Copies of the verses in the Holy Bible where the keeping of the Sabbath is commanded and observed by God, the ancient nation of Israel, Jesus (the Christ), Christ's disciples, and the New Testament church, (Note: This Holy Bible is the same instrument used by the Federal Court to swear in its Judges and the same instrument used to swear in each member of the Supreme Court and the same instrument used to swear in our President),

Copy of Pope John Paul II's encyclical, *Deis Domini*, dated May 1998 where he enjoins Catholics to observe Sunday as the day of rest and worship by the Catholic church and enjoins Catholics to work for civil legislation to sanction Sunday as a work-free day,

26 (a) (1) (C) Computation of damages is based on the on-going mental condition of the Plaintiff which includes fear of future reprisal from the Carpenter's Union in regard to loss of work and/or physical harm and loss of wages for the time periods in the range of the claims in this complaint. Loss of wages minus wages earned and unemployment compensation is a factor, but not the only factor in computation of damages. Damages are not sought for the first quarter of 2003 nor for the first week of April, 2003. Compensatory damages will be requested.

26 (a) (1) (D) This complaint and its damages are not covered by any insurance plan at this time nor ever have been. Medical assistance by the VA Medical Center is not being sought in this complaint.

26 (a) (2) (A) None known at this time

26 (a) (2) (B) The only know expert witnesses will be Dr. Ben Lomas and Dr. David Salisbury of the VA Medical Center, 3200 Vine Street, Cincinnati, OH 45220. Written reports will be submitted to the Defendants and the Court if these doctors are willing to do so.

26 (a) (3) (A) The witnesses I expect at this present time will include all those listed in 26 (a) (1) (A) but may be more as depositions and additonal discovery reveals. The Carpenter's Union probably has their addresses. I will request them soon when I submit my Interrogatories to the Defendants.

26 (a) (3) (B) Depositions of those listed in 26 (a) (1) (A).

26 (a) (3) (C) Documents listed in 26 (a) (1) (B) plus any the Carpenter's Union may provide Plaintiff in response to Interrogatories and Request for Production of Documents under Fed. R. Civ. P. #'s 26, 33, and 34.

To my knowledge this document complies with Rule 26 of the Fed. R. Civ. P. If Defendant's need any more information Plaintiff will readily and willingly provide such if possible.

Respectfully submitted this 26th day of December, 2003 by



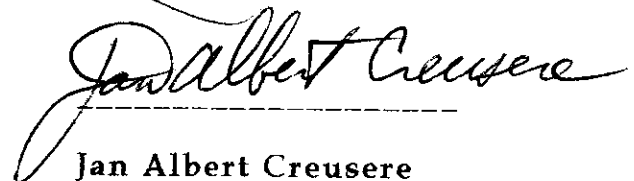
Jan Albert Creusere

3943 Hazel Avenue

Cincinnati, OH 45212

Certificate of Service

I, Jan Albert Creusere, Plaintiff *pro se*, do herby affirm that a true and accurate copy of this Initial Disclosure was sent to Fred Seleman, Counsel for the Defendants, c/o Ulmer and Berne, LLP, Penton Media Building, 1300 East 9th Street, Suite 900, Cleveland, OH 44114, via first class regular mail, postage prepaid on this 26th day of December, 2003.


Jan Albert Creusere

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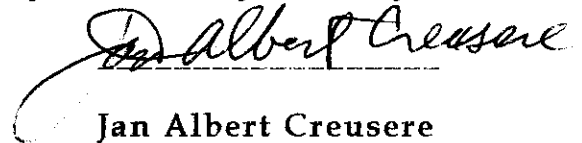
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To my knowledge this document complies with Rule 26 of the Fed. R. Civ. P. If Defendant's need any more information Plaintiff will readily and willingly provide such if possible.

Respectfully submitted this 2nd day of Janauary, 2004 by



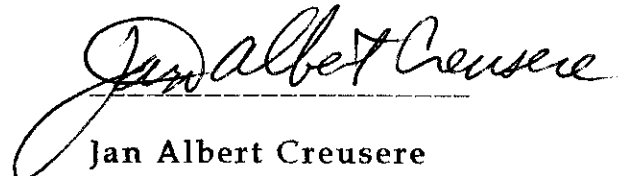
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Jan Albert Creusere